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## VIA ECF

September 4, 2025

Hon. Ona T. Wang  
Southern District of New York

Re: ***Request for Permission to File Over-Length Letter Regarding OpenAI's Declarations  
filed at Dkts. 461 and 482***  
*In re OpenAI, Inc., Copyright Infringement Litigation*, 25-md-3143 (SHS) (OTW); This  
Document Relates To: All Cases

Dear Magistrate Judge Wang:

We write on behalf of Class and News Plaintiffs (collectively, "Plaintiffs") to seek permission to file their over-length Letter to the Court regarding OpenAI's Declarations describing its custodial interview, collection, and review processes for text and social media messages (Dkts. 461, 482).<sup>1</sup> The proposed over-length Letter is attached hereto as Exhibit 1. Plaintiffs' letter is 3,497 words, thus exceeding this Court's 1,500 word count limit for letter correspondences. Plaintiffs respectfully submit that the length of the proposed Letter is necessary to address the numerous issues described in OpenAI's declarations, which total over 20 pages.

Although Plaintiffs do not affirmatively seek to seal any material, Plaintiffs are provisionally requesting that Exhibit 1 and the attachments thereto be filed under seal because they discuss documents and information that OpenAI has designated as Protected Discovery Material under the Protective Order.

Respectfully,

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<sup>1</sup> On September 2, 2025, Plaintiffs sought OpenAI's consent to file the over-length letter but, OpenAI refused to consent to the filing unless Plaintiffs agreed to the unreasonable condition that OpenAI would be permitted to file additional briefing of equal length.



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